
Exhibit 3

From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Friday, July 24, 2020 1:39 PM
To: Coles, Anthony P.
Cc: Saint-Fort, Dominique (Law); Saleski, Courtney; Hepworth, Michael
Subject: RE: 11am call on Friday - Uniformed Fire Officers Assoc. (discovery, meet and confer)

[EXTERNAL]

Hello all,

Defendants are not prepared to provide formal responses to the document requests by 2PM today, but we will do so by early next week. Our position on the scope of discovery remains the same as expressed on our call. Defendants object to the 30(b)(6) depositions. We are prepared to meet and confer after we serve our formal responses (not including relevant, responsive, non-privileged documents).

With respect to your expectation of confidentiality of disciplinary records, Defendants will of course comply with the TRO.

Thank you.

From: Coles, Anthony P. [mailto:anthony.coles@dlapiper.com]
Sent: Friday, July 24, 2020 1:04 PM
To: Quinn, Rebecca Jo (Law)
Cc: Saint-Fort, Dominique (Law); Saleski, Courtney; Hepworth, Michael
Subject: RE: 11am call on Friday - Uniformed Fire Officers Assoc. (discovery, meet and confer)

Rebecca,

We hope to hear back from you no later than 2pm today on your response to the document requests and 30b6 notice. These were provided to you in draft for “meet and confer” purposes in advance of our call this morning. Also, per your demand during that call, we sent the identical requests with “draft” removed before you would address them. You then indicated you needed more time to address them, and were not in a position to address them in the meet and confer.

It also should go without saying that to the extent you agree to produce of the requested Disciplinary Records, I expect that those will remain confidential by agreement of the parties.

Thank you, Tony

Anthony Coles
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From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Friday, July 24, 2020 8:58 AM
To: Coles, Anthony P. <anthony.coles@us.dlapiper.com>
Cc: Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>; Saleski, Courtney <Courtney.Saleski@us.dlapiper.com>; Hepworth, Michael <michael.hepworth@us.dlapiper.com>
Subject: RE: 11am call on Friday - Uniformed Fire Officers Assoc. (discovery, meet and confer)

[EXTERNAL]

Can we schedule the call for 11:30 or 11:45? We have conflicts earlier and at 11.

Thank you.

From: Coles, Anthony P. [<mailto:anthony.coles@dlapiper.com>]
Sent: Thursday, July 23, 2020 7:44 PM
To: Quinn, Rebecca Jo (Law)
Cc: Saint-Fort, Dominique (Law); Saleski, Courtney; Hepworth, Michael
Subject: RE: 11am call on Friday - Uniformed Fire Officers Assoc. (discovery, meet and confer)

Rebecca,

We actually don't understand why the city refuses to respond to the discovery we shared yesterday. It seems like the only reason would be to avoid advancing the process. To make sure that discovery is not slow rolled, attached please find a proposed document request, in draft form only, that I expect the city will meet and confer in good faith tomorrow at 11, and we can also discuss any necessary other types of discovery.

This draft is subject to change, of course, including, but not limited to, based on our discussions -- but if the city continues to refuse to respond or refuses to meet and confer in good faith at 11 tomorrow, you will give us no option but to seek the court's assistance.

Thank you for your attention , Tony

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From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Thursday, July 23, 2020 6:45 PM
To: Coles, Anthony P. <anthony.coles@us.dlapiper.com>
Cc: Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>; Saleski, Courtney <Courtney.Saleski@us.dlapiper.com>; Hepworth, Michael <michael.hepworth@us.dlapiper.com>
Subject: RE: 11am - Uniformed Fire Officers Assoc.

[EXTERNAL]

Tony, Pursuant to Judge Failla's order that we engage in limited discovery, and because what you sent us were draft discovery demands (as discussed on the record), written before Judge Failla issued her discovery order, we expected final demands tailored to the areas Judge Failla touched upon. (I believe she described that process as well.) We are happy to review and respond to final discovery requests and, according to the process Judge Failla ordered, if any disputes should arise, will get on a call and try to work them out.

From: Coles, Anthony P. [<mailto:anthony.coles@dlapiper.com>]
Sent: Thursday, July 23, 2020 6:22 PM
To: Quinn, Rebecca Jo (Law)
Cc: Saint-Fort, Dominique (Law); Saleski, Courtney; Hepworth, Michael
Subject: RE: 11am - Uniformed Fire Officers Assoc.

Rebecca:

You have written requests to review (that's what the judge was referring to) and we can start there – if we supplement will send you before the call at 11am,

Thank you:

Call in: 888-472-4293
Code: 3354844

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From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Thursday, July 23, 2020 6:16 PM
To: Coles, Anthony P. <anthony.coles@us.dlapiper.com>
Cc: Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>; Saleski, Courtney <Courtney.Saleski@us.dlapiper.com>; Hepworth, Michael <michael.hepworth@us.dlapiper.com>
Subject: Re: Call with Chambers - Uniformed Fire Officers Assoc.

[EXTERNAL]

Hello all,

We were expecting written demands based Judge Failla's decision, which we would consider before a meet and confer—assuming one would be necessary.

Do you have final demands for us to consider?

Thank you,
Rebecca

Sent from my iPhone

On Jul 23, 2020, at 5:55 PM, Coles, Anthony P. <anthony.coles@dlapiper.com> wrote:

Rebecca, following the court's instructions, we have been focused on discovery and would like to set up a call at 11am tomorrow. If that works, I can send around a call in #. Tony

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From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Wednesday, July 22, 2020 11:44 AM
To: Coles, Anthony P. <anthony.coles@us.dlapiper.com>
Cc: Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>; Saleski, Courtney <Courtney.Saleski@us.dlapiper.com>; Hepworth, Michael <michael.hepworth@us.dlapiper.com>
Subject: RE: Call with Chambers - Uniformed Fire Officers Assoc.

[EXTERNAL]

We think it would be more appropriate to wait for guidance from the court this soon before the conference. We did seek to confer with you on Monday.

From: Coles, Anthony P. [<mailto:anthony.coles@dlapiper.com>]
Sent: Wednesday, July 22, 2020 11:35 AM
To: Quinn, Rebecca Jo (Law)

Cc: Saint-Fort, Dominique (Law); Saleski, Courtney; Hepworth, Michael
Subject: RE: Call with Chambers - Uniformed Fire Officers Assoc.

Sure, scheduling and how quickly the city can expedite discovery?

Anthony Coles

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From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Wednesday, July 22, 2020 10:15 AM
To: Coles, Anthony P. <anthony.coles@us.dlapiper.com>
Cc: Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>; Saleski, Courtney <Courtney.Saleski@us.dlapiper.com>; Hepworth, Michael <michael.hepworth@us.dlapiper.com>
Subject: RE: Call with Chambers - Uniformed Fire Officers Assoc.

[EXTERNAL]

Hi Tony, Can you tell us what you would like to discuss?

Thanks,
Rebecca

From: Coles, Anthony P. [<mailto:anthony.coles@dlapiper.com>]
Sent: Wednesday, July 22, 2020 9:59 AM
To: Quinn, Rebecca Jo (Law)
Cc: Saint-Fort, Dominique (Law); Saleski, Courtney; Hepworth, Michael
Subject: RE: Call with Chambers - Uniformed Fire Officers Assoc.

As the court has set a call for 4pm, should we have a short meet and confer at 230?

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<image001.jpg>

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From: Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>
Sent: Wednesday, July 22, 2020 8:56 AM
To: Coles, Anthony P. <anthony.coles@us.dlapiper.com>

Cc: Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>
Subject: Call with Chambers - Uniformed Fire Officers Assoc.

[EXTERNAL]

Hi Tony,
We are planning to call Chambers this morning to discuss scheduling a conference. Would you like to join us?

Thanks,
Rebecca

Rebecca Quinn
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